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INTEROFFICE CORRESPONDENCE  
Richmond, Virginia

To: Distribution

Date: October 3, 1997

From: J. M. Garman

*JMG*

Subject: Massachusetts Regulations: Cigarettes / Smoking Machine Port Study

The puff parameters documented within the Massachusetts Regulations produce a significant increase in the delivery of Total Particulate Matter within the smoking analysis. Bleeding of TPM material through the Cambridge filter pad occurs when applying the FTC practice of smoking 5 cigarettes per smoking machine port. The FTC procedure does not specify a maximum limit of TPM on a 44 mm Cambridge filter pad. ISO 4387, "Cigarettes - Determination of Total and Nicotine Free Dry Particulate Matter using a Routine Analytical Smoking Machine," 1991, states that the amount of TPM on a 44 mm Cambridge filter pad shall not exceed 150 milligrams. Utilizing the Massachusetts Regulation, TPM's of greater than 300 milligrams per filter pad are possible when smoking 5 high-delivery cigarettes through one Cambridge filter pad.

In this study, the Massachusetts and normal FTC smoking procedures were applied to a non-filtered brand, (Best Buy, Brand Code BAZ1), where 16 ports of data was obtained via three and via five cigarettes per port. Data generated as part of a taping study, J. M. Garman memo, "Massachusetts Regulations: Cigarette Taping Study," October 2, 1997, was also used in this study.

All the resultant Cambridge filter pads did show bleed-through of TPM material. The attached results show that, at the TPM levels measured, this bleed-through has no effect on the resultant nicotine and tar results. The results for five cigarettes per port were consistent to those obtained utilizing three cigarettes per port.

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**MASSACHUSETTS RELULATION:**

**NUMBER OF CIGARETTES PER PORT STUDY**

Sample	Puff Count	TPM mg/cigt	Nicotine mg/cigt	Water mg/cigt	Tar mg/cigt	CO mg/cigt
<b>2R1F (5 cigt/port) *</b>	<b>13.8</b>	<b>56.5</b>	<b>2.59</b>	<b>18.52</b>	<b>35.4</b>	<b>32.7</b>
Std. Dev.	0.35	1.81	0.115	1.20	0.98	1.21
N	16	16	16	16	16	16
<b>2R1F (3 cigt/port) **</b>	<b>14.2</b>	<b>57.4</b>	<b>2.54</b>	<b>20.06</b>	<b>34.8</b>	<b>31.7</b>
Std. Dev.	0.45	3.99	0.139	2.27	1.79	1.63
N	15	15	15	15	15	13
<b>1R3F (5 cigt/port) *</b>	<b>12.1</b>	<b>45.9</b>	<b>2.25</b>	<b>14.25</b>	<b>29.4</b>	<b>26.1</b>
Std. Dev.	0.34	1.62	0.099	0.97	0.94	0.93
N	16	16	16	16	16	16
<b>1R3F (3 cigt/port) **</b>	<b>12.6</b>	<b>50.5</b>	<b>2.25</b>	<b>17.96</b>	<b>30.3</b>	<b>27.5</b>
Std. Dev.	0.75	1.65	0.118	1.30	1.11	0.91
N	15	15	15	15	15	12
<b>IM#16 (5 cigt/port) *</b>	<b>10.6</b>	<b>45.2</b>	<b>1.86</b>	<b>14.27</b>	<b>29.1</b>	<b>26.3</b>
Std. Dev.	0.29	1.74	0.052	0.90	1.06	0.93
N	16	16	16	16	16	16
<b>IM#16 (3 cigt/port) *</b>	<b>10.7</b>	<b>45.5</b>	<b>1.83</b>	<b>14.67</b>	<b>28.9</b>	<b>26.5</b>
Std. Dev.	0.42	2.19	0.155	1.05	1.18	0.87
N	16	15	15	15	15	14
<b>BAZ1 (5 cigt/port) ***</b>	<b>13.0</b>	<b>63.0</b>	<b>2.96</b>	<b>12.14</b>	<b>47.9</b>	<b>26.2</b>
Std. Dev.	0.38	1.27	0.057	0.71	0.65	0.72
N	16	16	16	16	16	16
<b>BAZ1 (3 cigt/port) ***</b>	<b>13.2</b>	<b>63.1</b>	<b>3.00</b>	<b>12.40</b>	<b>47.7</b>	<b>26.5</b>
Std. Dev.	0.45	2.47	0.165	0.87	1.64	0.98
N	16	16	16	16	16	16

\* Data obtained from study documented in memo by J. M. Garman, "Massachusetts Regulations: Cigarette Taping Study," October 2, 1997.

\*\* Data obtained as part of above study. Cigarette tipping paper completely taped.

\*\*\* Best Buy Non-Filter. Cigarettes unequilibrated.